

To whom it may concern:

My name is Jessica Rogalski. I am a sign Language interpreter, as well as the parent of a child of a deaf adult. As a person who is involved in the deaf community I am familiar with the barriers to communication that exist for telephonic communications. Please take the following points into consideration when reviewing the comments for the Notice of Proposed Rulemaking on Prison Telephone Rates to Support Access to Videophones, Captioned Telephones and Reasonable Rates for Deaf & Signing Prisoners and their Families.

ICSs & prisons should be required to install videophones, captioned telephones, and other auxiliary aids for deaf, speech impaired and signing prisoners to ensure equal telecommunication access for ALL prisoners

ASL, not English is the primary language for many deaf people. Many Americans who grow up deaf use American Sign Language (ASL) as their primary or only method of communication. ASL is not a manual representation of English. ASL is its own language with a unique syntax and grammar. Unlike most spoken languages, ASL does not have a written component. As a result, many deaf individuals require sign language for effective communication, and can only communicate effectively through sign language. With the current prison telephone system, prisoners in forty-seven states and the federal prison system cannot communicate with their children if the child signs but cannot yet read.

TTY technology is antiquated and often incompatible with modern communications technology. Having been developed in the 1960's as a basic mode of telecommunication for the deaf, the TTY has inherent limitations. The technology relies on typewritten words and an audio coupler to transmit signals to an operator or another TTY machine. No matter how fast a person types, these signals are sent at the rate of 45 characters per minute. As such, conversations via TTY are at least four times slower than voice-to-voice conversation, not including time required for connecting to the relay operator, translation. The TTY cannot connect to videophones, so many prisoners with signing family members have no contact with their family. This is especially problematic for District of Columbia prisoners who are housed in federal prisons as far away as Arizona, California & Florida.

Videophones rely on visual communication and are the preferred method of communication in the deaf community. Videophones (VPs) and captioned telephones are the better telecommunication option for many deaf people. Typewritten communication is not the equivalent of voice communication for individuals who communicate in sign language, and prisoners with residual hearing can follow telephone conversations on their own with some assistance. With the advent of new technology and relay services, including internet-based relay services and VP technology that allows sign language users to communicate in sign language in real-time, most TTY users have migrated to other forms of communication to access the telephone network. A 2012 report from the FCC's TTY Transition Subgroup of the Emergency Access Advisory Committee indicates that TTY use is decreasing by about 10% per year, and

has cut in half over the past seven years. The same report indicates that TTY traditional relay is only 12% of the total relay volume. To ensure equal access to telecommunications, some prison and jail systems have installed VPs for signing prisoners. Regrettably, only a handful of prisons are equipped with VPs (e.g., VT, VA, WI) and no prison or jail is known to have installed captioned telephones, many using security as an excuse for discrimination (e.g., CA, NY, Federal BOP). Other facilities ensure that deaf prisoners have access to free TTY calls pursuant to the Telecommunications Act of 1996 (e.g., at least one facility in PA).

Prisons often limit access to TTYs. Many prisons block toll-free numbers for “security purposes,” thus preventing deaf prisoners from using relay altogether (e.g., GA, MD). In addition, at many prisons, deaf prisoners must file written requests days in advance to use the TTY which is often stored in a counselor’s office (e.g., CA, DE, FL, MD, OH, Federal BOP). In states where rates are cheaper during the evenings and on the weekends, deaf prisoners cannot take advantage of these rates because staff is gone during those times.

Thank you for your time,
Jessica Rogalski